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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD and DENOVIAS MACK,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**DECLARATION OF SIMON S. GRILLE
IN SUPPORT OF JOINT
STIPULATION TO EXTEND THE
BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

1 I, Simon S. Grille, declare as follows:

2 1. I am a partner at Girard Sharp LLP, counsel for Plaintiffs Brayden Stark, Judd Oostyen,
3 Isaac Belenkiy, Valerie Burton, Laura Goodfield, and Denovias Mack (“Plaintiffs”) in this matter. I have
4 personal knowledge of the facts set forth herein, and, if called upon to testify, could and would testify
5 competently thereto.

6 2. This declaration is made in support of the Joint Stipulation to Extend the Briefing
7 Schedule on Plaintiffs’ Motion for Class Certification.

8 3. On February 12, 2024, the Court issued an Order granting in part Plaintiffs’
9 Administrative Motion to Continue Class Certification Schedule.

10 4. Under the Court’s Order, Plaintiffs’ deadline to file their motion for class certification is
11 April 29, 2024; Patreon’s deadline to file its opposition to class certification is June 12, 2024; Plaintiffs’
12 deadline to file their reply is currently June 28, 2024; and the hearing on the Motion is currently set for
13 August 2, 2024.

14 5. Plaintiffs intend to support their certification motion with expert reports and Patreon
15 intends to support its opposition with expert reports.

16 6. The current briefing schedule does not allow adequate time for Plaintiffs to take
17 discovery of Patreon’s experts, including depositions, before filing their reply, and the Parties
18 accordingly agree that additional time is appropriate to allow Plaintiffs to take discovery of Patreon’s
19 class certification experts before filing their reply.

20 7. The Parties thus seek a modest extension of the current briefing schedule, such that
21 Plaintiffs’ deadline to file their reply in support of class certification would be continued to July 10,
22 2024, and that the hearing on the Motion would be continued to August 16, 2024, or as soon thereafter
23 as is convenient for the Court.

24 8. The requested extension will not alter the date of any other event or deadline already
25 fixed by Court order.

26 9. The following scheduling modifications have occurred in this case:
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- Pursuant to stipulation, the Court extended Patreon's time to respond to the complaint, from June 21, 2022, to August 5, 2022 (*see* ECF No. 13).
- Pursuant to stipulation, the Court extended the briefing schedule for Patreon's motion to dismiss the original Complaint (*see* ECF No. 26).
- Pursuant to stipulation, the Court twice extended the time for the United States to decide whether to intervene in this case for the purpose of defending the constitutionality of the VPPA (*see* ECF No. 34 and 43).
- Pursuant to stipulation, the Court extended Patreon's time to respond to the First Amended Complaint, extended the briefing schedule on Patreon's Motion to Dismiss the First Amended Complaint, and extended the time for the United States to decide whether to intervene in this case for the purpose of defending the constitutionality of the VPPA (*see* ECF No. 45).
- Pursuant to stipulation, the Court extended Patreon's time to file its reply brief in support of Patreon's Motion to Dismiss (*see* ECF No. 53).
- The Court granted Plaintiffs' Administration Motion to Continue Class Certification in part and extended the class certification schedule (*see* ECF No. 124).
- Pursuant to stipulation, the Court extended Patreon's time to respond to the Second Amended Complaint (*see* ECF No. 126).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 4, 2024

By: /s/ Simon Grille

Simon S. Grille